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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION
15

16 UNITED STATES OF AMERICA,) CR 09-0496 (WHA)
17 Plaintiff,)
18 v.) STIPULATION AND [PROPOSED] ORDER
19 SANTOS LISCONA-TURCIO,) EXCLUDING TIME UNDER FED. R. CRIM.
20 Defendant.) 18 U.S.C. § 3161
21

22 On June 2, 2009, the parties in this case appeared before the Court for a status
23 conference. At that time, the parties requested, and the Court agreed, to continue this matter for
24 a change of plea and sentencing, on July 14, 2009. The parties agree that, taking into account
25 the public interest in prompt disposition of criminal cases, good cause exists for this extension.
26

27 The defendant also agrees to exclude for this period of time any time limits applicable
28 under 18 U.S.C. § 3161. The parties represented that granting the continuance was the

1 reasonable time necessary for continuity of counsel and effective preparation. 18 U.S.C. §
2 3161(h)(7)(B)(iv). The parties also agreed that the ends of justice served by granting such a
3 continuance outweighed the best interests of the public and the defendant in a speedy trial. 18
4 U.S.C. § 3161(h)(7)(A).

5 SO STIPULATED:

6 JOSEPH P. RUSSONIELLO
7 United States Attorney

9 DATED: June 2, 2009

/s/
10 BENJAMIN P. TOLKOFF
Assistant United States Attorney

12 DATED: June 2, 2009

/s/
13 DANIEL BLANK
Attorney for SANTOS LISCONA-TURCIO

14 For the reasons stated above, the Court finds that the continuation of this matter from June 2,
15 2009, to July 14, 2009, is warranted and that the ends of justice served by the continuance
16 outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §3161
17 (h)(7)(A). The failure to grant the requested continuance would deny the defendant effective
18 preparation of counsel, and would result in a miscarriage of justice. 18 U.S.C.
19 §3161(h)(7)(B)(iv).

21 SO ORDERED.

23 DATED: June 3, 2009

